

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

<b>Proceeding by the Department of</b>	)	
<b>Telecommunications and Energy on Its Own</b>	)	
<b>Motion To Implement the Requirements Of</b>	)	<b>DTE. 03-60</b>
<b>The Federal Communications Commission's</b>	)	
<b>Triennial Review Order Regarding Switching</b>	)	
<b>For Mass Market Customers</b>	)	

**CONVERSENT'S SEVENTH SET OF INTERROGATORIES TO VERIZON**

Conversent Communications of Massachusetts, LLC ("Conversent") submits to  
Verizon Massachusetts ("Verizon") the following interrogatories.

**INSTRUCTIONS**

1. Each interrogatory should be answered on a separate page preceded by the request and by the name of the person responsible for the answer;
2. Please provide answers as they are completed;
3. These interrogatories shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests;
4. If an answer refers to Verizon's response to another interrogatory in this proceeding, please provide that response with the answer;
5. If Verizon cannot answer a request in full, answer to the extent possible and please state why Verizon cannot answer the request in full;
6. If Verizon refuses to respond to any interrogatory by reason of a claim of privilege, please state the privilege claimed and the facts relied upon to support the claim of privilege.

**INTERROGATORIES**

CONV-VZ-7-1	Please describe what operational reports were used to calculate a non-flow through rate of 23% as indicated in Exhibit Supp-III, dated December 17, 2003, rows 2 and 4 of column D ("connect typical occurrence" for "query CLEC about non-flow through order" and "create order manually, if necessary". Please provide copies of the reports upon which Verizon relied, please specify the
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date that the reports were prepared, and provide an explanation as to how Verizon used the information in those reports to calculate the 23 %. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., excel spreadsheet).

- CONV-VZ-7-2 For the operational reports referred to in question 7-1 above, please specify what percentage of the total number of orders that were analyzed were hot cut orders. Please provide a description of all other types of orders that were used in the denominator of the total number of orders. Please provide an explanation of what type of order was analyzed in the "req. type" column used in the report (e.g. "AB, BB, CB, DB, etc.") or comparable codes used to describe what types of orders were used in the reports.
- CONV-VZ-7-3 Please describe what operational reports were used to calculate a non-flow through rate of 25% as indicated in Exhibit Supp-III, row 5 of column D ("connect typical occurrence" for "refer assignment problem to CLEC APC, NMC". Please provide copies of the reports upon which Verizon relied, please specify the date that the reports were prepared, and provide an explanation as to how Verizon used the information in those reports to calculate the 25%. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., excel spreadsheet).
- CONV-VZ-7-4 For the operational reports referred to in question 7-3 above, please specify what percentage of the total number of orders that were analyzed were hot cut orders. Please provide a description of all other types of orders that were used in the denominator of the total number of orders. Please provide an explanation of what other types of order were analyzed in the "req. type" column used in the report (e.g. "AB, BB, CB, DB, etc.") or comparable codes used to describe what types of orders were used in the reports used to produce the 25% calculation.
- CONV-VZ-7-5 Please describe what operational reports were used to calculate a non-flow through rate of 50% as indicated in Exhibit Sup-III, row 6 of column D ("connect typical occurrence" for "cancel or modify due date on order, if necessary". Please provide copies of the reports upon which Verizon relied, please specify the date that the reports were prepared, and provide an explanation as to how Verizon used the information in those reports to calculate the 50%. Please provide all data and calculations in an electronic form in which the data can be manipulated (e.g., excel spreadsheet).
- CONV-VZ-7-6 For the operational reports referred to in question 7-5 above, please specify what percentage of the total number of orders that were analyzed were hot cut orders. Please provide a description of all

other types of orders that were used in the denominator of the total number of orders. Please provide an explanation of what other types of order were analyzed in the "req. type" column used in the report (e.g. "AB, BB, CB, DB, etc.") or comparable codes used to describe what types of orders were used in the reports used to produce the 50% calculation.

CONV-VZ-7-7 When did Verizon roll out WPTS for use in Massachusetts?  
Please provide, on a monthly basis, the number of WPTS hot cuts performed by Verizon since Verizon began offering WPTS hot cuts in Massachusetts.

Dated: January 20, 2004

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